

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In re Applications of)	
)	FCC File Nos.
Ackerley Media Group, Inc.)	BSRECT-20051028ACZ
Telefutura Sacramento LLC)	BSRECT-20051031ADV
KTVU Partnership)	BSRECT-20051031ABN
KTNC License, LLC)	BSRECT-20051031ABG
KVIE, Inc.)	BSREET-20051020AAA
)	
Digital Channel Election Form Second Round)	MB Docket No. 03-15
Election and Negotiated Channel Arrangement)	

To: Marlene H. Dortch, Secretary
Office of the Secretary
Attn: Chief, Media Bureau

**COMMENTS IN SUPPORT OF
NEGOTIATED CHANNEL ARRANGEMENT**

Educational Media Foundation (“EMF”), by its attorneys and pursuant to the Commission’s Public Notice, DA 05-3031, released November 23, 2005,^{1/} hereby submits its comments in support of the Negotiated Channel Arrangement (the “NCA”) referenced in the captioned applications.^{2/} As part of the NCA, KVIE, Inc., license of KVIE(TV), channel 6, Sacramento, California, and permittee of KVIE-DT, channel 53, elected channel 9 for post-transition digital operation. As the licensee of noncommercial educational radio broadcast and FM translator stations serving several northern California communities, EMF supports this

^{1/} See *Second Round DTV Channel Election Issues – Proposed Negotiated Channel Arrangements and Procedures for Filing Associated Pleadings*, Public Notice, DA 05-3031 (Nov. 23, 2005).

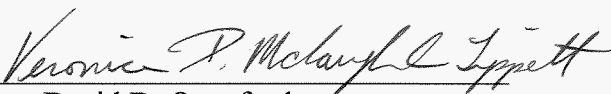
^{2/} Young Broadcasting of San Francisco, Inc., licensee of KRON-DT, San Francisco, is also a party to the NCA, although its application makes no mention of the agreement. See FCC File No. BSRECT-20051031AAW.

channel election because it would enable EMF to better serve area listeners. Specifically, EMF supports the desire of KVIE, Inc. to cease using its current analog channel 6, which has the potential for interference with FM operations in the noncommercial band and has, in fact, limited certain operations of EMF stations. A move by KVIE, Inc. to channel 9 would permit EMF to enhance operations on several of its radio stations, including potentially through the addition of vertical polarity to KLVN(FM), Livingston, California, and KARQ(FM), East Sonora, California, and would give EMF greater flexibility in locating optimal transmitter sites to serve the Sacramento area. Accordingly, EMF supports this election and hence the entire NCA among the parties.

Therefore, EMF respectfully requests that the FCC approve the proposal as being in the public interest.

Respectfully submitted,

EDUCATIONAL MEDIA FOUNDATION

By: 
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Dated: December 7, 2005
530815-0000000

CERTIFICATE OF SERVICE

I, Renee Williams, do hereby certify that I have this 7th day of December, 2005, mailed by express mail, postage prepaid, copies of the foregoing “**COMMENTS IN SUPPORT OF NEGOTIATED CHANNEL ARRANGEMENT**” to the following:

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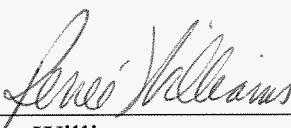
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